

JOHN L. RUSSO
ATTORNEY AT LAW

COUNSEL
Milton Florez, Esq.
Michael Horn, Esq.

J.L. Russo, P.C.
31 · 19 Newtown Avenue, Suite 500
Astoria, New York 11102
Tel: 718 · 777 · 1277
Fax: 718 · 204 · 2310
Email: JLRussoPC@Gmail.com

PARALEGAL
Maria Nunez, B.S.

April 10, 2023

Via ECF
Honorable Ronnie Abrams
United States District Court Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: USA v. Josefina Marine
Case No.: S3 22-CR- 91(RA)

Motion denied, for the reasons stated by the
Government in its opposition letter.

SO ORDERED.


Ronnie Abrams, U.S.D.J.
April 11, 2023

Your Honor:

This office represents Josefina Marine, a defendant in the above referenced matter. We write to request the Court's modification of Ms. Marine's pre-trial release conditions so as to permit the removal of electronic monitoring, the alleviation of "house arrest" and permission for the Defendant to return to her home at 431 W17th Street in Manhattan, New York for the pendency of her pre-trial release.

We have consulted with P.O. Ashley Cosme and she has **no objection** to the requested modifications of conditions. AUSA Micah Fergenson has been advised of this request and the Government has not yet expressed a position hereto.

The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,
John Russo
John L. Russo (JR6200)

Cc: AUSA Micah Fergenson
PO Ashley Cosme